

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

In re: Jacqueline Michelle Lennon,)	
)	
CAROLYN L. CAMARDO,)	Case No.: 13-74773-FJS
)	Chapter: 7
Plaintiff,)	
v.)	Adversary Proceeding No. 15-07108-FJS
)	
JACQUELINE MICHELLE LENNON,)	
)	
Defendant.)	
)	

MOTION TO WITHDRAW

COMES NOW Kristi L. Johnson (“Movant”), and, pursuant to Local Bankruptcy Rule 2090-1(G), moves for an order to withdraw as counsel for Jacqueline M. Lennon (“Debtor”) in the above-captioned action. In support of this motion, Movant states as follows:

1. For reasons Movant cannot disclose by virtue of the attorney-client privilege that exists between Debtor and Movant, Movant is unable to further represent Debtor. In addition, Debtor, who never paid any fees associated with representation, has repeatedly and consistently failed or refused to communicate or cooperate with Movant concerning matters critical to this case for several months, resulting in an “impasse in necessary communication and cooperation between counsel and client that precludes effective representation on a continuing basis.” *NGM Ins. Co. v. Secured Title & Abstract, Inc.*, No. 3:07CV536, 2008 U.S. Dist. LEXIS 33478, at *4, 2008 WL 1826032, at *1 (E.D. Va. Apr. 23, 2008).

2. As this adversarial proceeding is in its beginning stages and no trial date has been set, this withdrawal can be effected without material prejudice to Debtor.

3. Debtor has received notice of counsel's intention to seek withdrawal of representation, and has been provided with notice as to this Motion, and any hearing thereon, in accordance with Local Bankruptcy Rule 9013-1 and any other applicable rules of this Court. Though notice was provided, for the first time, more than nine months prior to filing this Motion, Debtor has never expressed any objection to Movant's intention to seek withdrawal from representation.

WHEREFORE, for the foregoing reasons, Movant respectfully requests that this Honorable Court enter an Order granting this Motion to Withdraw as counsel for Debtor, withdrawing Counsel's appearance for Debtor in the above-captioned underlying and adversarial proceedings, and granting such other and further relief the Court deems appropriate.

Dated: December 23, 2015

Respectfully submitted,

By: /s/ Kristi L. Johson
Kristi L. Johnson, VSB No. 77776
5055 Seminary Road, #938
Alexandria, VA 22311
Phone: (757) 593-1980
Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of December, 2015, a true and accurate copy of the foregoing Motion to Withdraw, together with a copy of the Notice of Electronic filing associated herewith, was served by email, U.S. first class mail, and certified mail, postage prepaid, on:

Jacqueline M. Lennon
404 S. Rosemont Road
Virginia Beach, VA 23452
jalennon@portfoliorecovery.com
wintersgammy@gmail.com

/s/ Kristi L. Johnson
Kristi L. Johnson, VSB No. 77776
5055 Seminary Road, #938
Alexandria, VA 22311
Phone: (757) 593-1980
Counsel for Debtor